

UNITED STATES DISTRICT COURT
 for the
 Eastern District of Pennsylvania

In the Matter of the Search of _____
(Briefly describe the property to be searched or identify the person by name and address) _____)
 ZAMER WILLIAMS: ORAL SECRETION (EPITHELIAL)
 CELLS) FROM THE INNER CHEEK LINING OF THE)
 MOUTH CAVITY _____)
)
 Case No. 24-MJ-545

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

See Attachment A. This court has authority to issue this warrant under 18 U.S.C. §§ 2703(c)(1)(A).

located in the Eastern District of Pennsylvania, there is now concealed (*identify the person or describe the property to be seized*):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2119	Carjacking
18 U.S.C. § 2	Aiding and Abetting

The application is based on these facts:

See attached affidavit

- Continued on the attached sheet.
- Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

/s/ Jared Krzywicki

Applicant's signature

Jared Krzywicki Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/28/2024

/S/ Scott W. Reid

Judge's signature

City and state: Philadelphia, PA

Scott W. Reid, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
 for the
 Eastern District of Pennsylvania

In the Matter of the Search of _____)
(Briefly describe the property to be searched or identify the person by name and address))
 Case No. 24-MJ-545
 _____)
 _____)
 ZAMER WILLIAMS: ORAL SECRETION (EPITHELIAL CELLS))
 FROM THE INNER CHEEK LINING OF THE MOUTH CAVITY)
 _____)

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the Eastern District of Pennsylvania
(identify the person or describe the property to be searched and give its location):

See Attachment A. This court has authority to issue this warrant under 18 U.S.C. §§ 2703(c)(1)(A).

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal *(identify the person or describe the property to be seized):*

See Attachment B

YOU ARE COMMANDED to execute this warrant on or before April 10, 2024 (*not to exceed 14 days*)
 in the daytime 6:00 a.m. to 10:00 p.m. at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to the duty magistrate.

Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized *(check the appropriate box)*

for _____ days (*not to exceed 30*) until, the facts justifying, the later specific date of _____.

Date and time issued: 03/28/2024 4:15 pm

/S/ Scott W. Reid

Judge's signature

City and state: Philadelphia, PA

Scott W. Reid, U.S. Magistrate Judge

Printed name and title

Return

Case No.: 24-MJ-545	Date and time warrant executed:	Copy of warrant and inventory left with:
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Inventory made in the presence of :

Inventory of the property taken and name of any person(s) seized:

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: _____

Executing officer's signature

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR EASTERN DISTRICT OF PENNSYLVANIA

IN THE MATTER OF THE SEARCH OF
ZAMER WILLIAMS: ORAL SECRETION
(EPITHELIAL CELLS) FROM THE INNER
CHEEK LINING OF THE MOUTH CAVITY

Magistrate No. 24-MJ-545

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Jared Krzywicki, a Special Agent with Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant pursuant to 18 U.S.C. § 2703(c) and Federal Rule of Criminal Procedure 41, for the person of Zamer Williams, as described in Attachment A, to obtain oral secretion (epithelial cells) by rubbing cotton swabs against the inner lining of Smith’s mouth cavity, in sufficient quantity for scientific examination and comparison for DNA typing and DNA comparison, as described in Attachment B.

2. I am a Special Agent for the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), and have been so employed since July 2017. I am thus a “federal law enforcement officer” as defined by Fed. R. Crim. P. 41(a)(2)(C). Prior to being employed by the ATF, I worked as a Philadelphia Police Department (PPD) Officer for

10 years, assigned to the 18th District and 25th District. While assigned to the 25th District I worked in the tactical unit focusing on violent crimes and the Narcotics Enforcement Team, focusing on narcotics sales throughout the Eastern Division of Philadelphia. As a Police Officer, I gained valuable experience while making hundreds of felony arrests. I also participated in hundreds of investigations, as well as the application and execution of warrants. I am currently assigned to ATF Philadelphia Group VII, which is a Firearms Enforcement Group tasked with investigating violent carjackings in the Philadelphia area. Additional responsibilities of this Group include investigating violent crime through the interdiction of firearms being possessed or used by violent criminals in Philadelphia, Pennsylvania. During my career as an ATF Special Agent, I have executed federal search warrants and have seized evidence in accordance with the probable cause set forth in the affidavits. I have arrested individuals in violation of federal firearms laws; I am familiar with the legal standards applicable to the issuance of search warrants and with appropriate procedures for seizing evidence recovered through the execution of search warrants.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter. Based on the facts set forth in this affidavit, there is probable cause to believe Zamer WILLIAMS' DNA, obtained from buccal swabs, will reveal evidence of WILLIAM'S involvement in violations of 18 U.S.C. § 2119, 18 U.S.C. § 924(c), and 18 U.S.C. § 2.

JURISDICTION

4. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711, 18 U.S.C. § 2703(a), (b)(1)(A), & (c)(1)(A). Specifically, the Court is “a district court of the United States...that has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

PROBABLE CAUSE

Carjacking #1 of Victim M.M. at 2600 S. Columbus Blvd

5. Victim M.M.¹. stated to PPD Detectives that on November 11th, 2023, at approximately 9:00 pm, M.M. was working as an Uber driver when he pulled up to the front of IKEA located at 2206 S. Columbus Blvd. M.M. and got out of his car leaving the engine running to his gray 2016 Mazda CX5, Pa tag LVF-5862, VIN: JM3KE4DY4G0647181. While outside the vehicle, M.M. was approached by two males. Offender #1 attempted to gain control of the vehicle and pointed a handgun affixed with a red laser at M.M. After M.M. and offender #1 started struggling for control of the vehicle, offender #2 pushed M.M. out of the way and onto the ground. Both offenders got into the car and fled southwest on Weccacoe Ave. Also taken during the carjacking was the M.M.’s cell phone which was inside the vehicle but could not be tracked.

6. After reviewing the police reports, your affiant ran a check of any LPR readings of Pa Tag LVF-5862 in the Vigilant LPR System. The LPR system operates to capture images of license plates that travel through specified areas. By searching the LPR system a law enforcement officer may be able to determine whether a particular license plate travelled through an area, and/or determine paths of travel of a particular license plate. After searching the LPR system your affiant

¹ The victims described in this affidavit are known to law enforcement and have been interviewed in connection with this investigation. They provided information as a victim/witness and not in expectation or receiving compensation or consideration in connection with any criminal case. The information provided is believed to be truthful and credible as aspects have been corroborated by other evidence in this investigation.

located an LPR reading which occurred shortly after the carjacking (11/11/2023) at 9:22 p.m., occurring at 724 Haddon Avenue, Camden, NJ. This indicates to me that within approximately 20 minutes of the carjacking, MM's vehicle traveled to Camden, New Jersey.

7. The vehicle was recovered on November 12, 2023, at South 9 Street and Thurman St, in Camden, New Jersey. Philadelphia Police Department (PPD) swabbed the vehicle for DNA and lifted fingerprints from the vehicle. The fingerprints were sent to the Office of Forensic Science for PPD. WILLIAMS right ring fingerprint was an AFIS match to the fingerprint that was lifted from the window tint sheet that was on the front passenger side floorboard.

8. ATF Special Agents traveled to IKEA on November 15, 2023, and recovered surveillance footage which captured the carjacking on video. Your affiant was able to review the video which shows the offenders arrive in a silver 4 door sedan at approximately 8:56 p.m. Offender #1 exits the rear driver side door of the vehicle, while offender #2 exits the front passenger door. Offender #1 is seen struggling with M.M. for a short period before stepping back and pointing a small object with a light coming from the front of the object (this corroborates M.M.'s statement that the offender had a handgun with a red laser attached). As offender #1 is pointing the handgun at M.M., offender #2 gets into the driver seat and begins to drive away in the Mazda. Offender #1 then runs and enters the front passenger seat of the Mazda. Offender #3 who is operating the silver sedan remains in the driver seat and drives off after the carjacking is completed.

Carjacking #2 of Victim L.S at 1600 Columbus Blvd

9. Victim L.S. stated to PPD Detectives that at approximately 9:00 p.m., on November 13, 2023, she parked her vehicle, a black 2016 Ford Fusion sedan, with Pa. tag MDR-4125, Vin: 3FA6P0H73GR174300 in a parking spot in front of the Wawa located at 1600 Columbus Boulevard, Philadelphia, Pennsylvania. L.S. then entered the store briefly before returning to her car. L.S. stated that she saw a male get into her car, and that the male who entered her vehicle pointed a gun at her. L.S. stated she attempted to grab onto the vehicle's door handle and the suspect drove off dragging her onto the street from the parking lot, as a result she sustained injuries to her feet. L.S. stated that she then ran back to her friend I.H.'s vehicle which was also parked in the Wawa lot, and they attempted to chase after L.S.'s vehicle but were unable to locate it.

10. Witness I.H. reported after arriving at the Wawa in her own vehicle, she observed an unknown male exit a white Ford SUV (similar to a Ford Flex) and enter L.S.'s vehicle. I.H. stated she confronted him, asking him not to steal the car. I.H. stated she observed a firearm on the right hip of the offender, but that he did not threaten her or point the firearm at her during their interaction.

11. After reviewing the police reports, your affiant ran a check of any LPR readings of PA Tag MDR-4125 in the Vigilant LPR System. After searching the LPR system your affiant located an LPR reading which occurred the morning after the carjacking (11/14/2023) at 8:34 a.m., occurring at 250 Memorial Ave, Camden, NJ. This indicates to me that within approximately 12 hours of the carjacking, L.S.'s vehicle was located within Camden, New Jersey.

Armed ATM Robberies in Pennsylvania and Delaware

12. Beginning in September of 2023, Philadelphia Police Detectives began investigating a pattern of violent gunpoint robberies involving victims being targeted while making deposits and withdrawals from ATM machines. Surveillance footage was recovered on a number of these robbery

incidents. Several of the incidents showed the suspects wearing the same clothing and using the same Modus Operandi to commit the robberies. In each incident the victim was ambushed by multiple suspects armed with handguns after making a withdrawal at ATM machine. Additionally, cell site precision data, along with video evidence and WILLIAMS' confession (explained in more detail below), has placed suspect Zamer WILLIAMS at four ATM robberies in Delaware, and at least 9 ATM robberies in Philadelphia. Some of the robberies were also committed at the same ATM on more than one occasion. Additionally, in the incidents where a license plate was recorded on the suspect's vehicle and entered into the Vigilant LPR System, the license plates were later read in Camden, NJ. Further investigation of the vehicles used for these robberies revealed that at least six of the vehicles used during the robberies were either stolen or carjacked from Philadelphia, and then used in the ATM robberies, with 4 of the vehicles being used in more than one robbery incident. Beginning in September there have been over 20 such robberies in Philadelphia and its surrounding counties, and four in Delaware.

Arrest of Zamer WILLIAMS, Tymere HAUSER, and Raj DOWAYEE

13. On November 14, 2023, after being alerted by Vigilant LPR system that L.S.'s vehicle with PA Tag MDR-4125 was traveling in Camden, NJ, ATF Task Force members from both Philadelphia and Camden, along with Camden Metro Police, began to look for L.S.'s carjacked Ford Fusion (as described in paragraph nine) in Camden, NJ. At approximately 2:30 p.m., Task Force members located the Ford Fusion parked behind a group of houses in a makeshift parking lot in the area of 1300 Argus Rd., Camden, NJ. The vehicle was affixed with a different PA License Plate, #KJZ-0744², but was identified by the distinct body damage to the passenger side doors, as well as significant damage to the trunk.

² This license plate was later confirmed to be stolen from the back of a vehicle in Philadelphia.

14. ATF Task Force members, working in plain clothes and unmarked vehicles, set up surveillance of the vehicle to see if anyone returned. At approximately 4:45 p.m. three individuals entered the vehicle and began to drive off. Task Force members blocked the exits of the parking lot while activating their lights and sirens on the vehicles. All three males then exited the vehicle and attempted to flee on foot.

15. Tymere HAUSER who was seated in the front passenger seat, attempted to run and was immediately taken into custody. Recovered from HAUSER's waistband was a black, Smith and Wesson 9mm Pistol, serial number NJU5956, loaded with eight (8) live rounds.

16. Raj DOWAYEE who seated in the rear seat of the vehicle, attempted to run and was immediately taken into custody.

17. Zamer WILLIAMS who was seated in the driver seat of the vehicle, fled and hopped a fence. running towards Congress Road. WILLIAMS was pursued by Task Force members and Camden Police Officers and taken into custody in the area of 2800 Congress Road after a brief foot pursuit. An iPhone 15 was recovered from WILLIAM's pocket and was retained as evidence by Special Agent Krzywicki.

18. The vehicle was left running with a Ford key fob in the ignition and was later confirmed to be the black 2016 Ford Fusion sedan, Vin: 3FA6P0H73GR174300 that was carjacked from L.S. approximately 19 hours prior. PPD swabbed the vehicle for DNA and lifted fingerprints from the vehicle. WILLIAMS right middle and right index fingerprints were lifted from the stolen license plate (mentioned in paragraph 13).

Interview of Zamer Williams

19. WILLIAMS was arrested and taken to Camden Police headquarters. At approximately 9:00 p.m. WILLIAMS was read his Miranda Warnings, which he waived and

agreed to speak to investigators. WILLIAMS admitted to me that he took the Ford Fusion from L.S. and stated that he drove off as L.S. was hanging onto the door handle, but denied pointing a gun at L.S. WILLIAMS denied taking part in the carjacking of M.M., but stated that he was “picked up” in M.M.’s carjacked Mazda after it was taken. WILLIAMS stated he was “picked up” while in Camden and got into the front passenger seat. WILLIAMS also admitted to his involvement in multiple ATM robberies in both Philadelphia and two robberies in Delaware.

WILLIAMS Cell Phone Data

20. On November 21, 2023, I obtained search warrant 23-MJ-2012 to dump WILLIAMS’ cellphone that was recovered on his person during his arrest (mentioned above in paragraph 17). The phone number of 856-773-8862 was extracted from the phone.

21. On November 22, 2023, I obtained search warrant 23-MJ-2013 for cell site data timing advance for the above-mentioned phone number from T-Mobile.

22. The cell site data timing advance data placed WILLIAMS’ cell phone in the vicinity of the November 11, 2023, carjacking between 8:57 p.m. and 9:00 p.m. Furthermore, his cell site showed him at Pine St and Haddon Ave at 9:23 pm, which is the same time the vehicle license plate was spotted on the LPR.

23. In reference to the carjacking of the Ford Fusion on November 13, 2023, WILLIAMS’ cell site placed him in the area of 1602 S. Columbus Street between 8:40 and 8:42 pm. Furthermore, WILLIAMS’ cell site showed he was in the area of 250 Memorial Ave on November 14, 2023, at 8:35 am, a minute after the LPR registered the Fusion license plate.

24. Williams was indicted by grand jury on March 21, 2024, on two counts of 18 U.S.C. § 2119 and 2.

25. In my training and experience, I know that when a person handles a weapon, he or she may leave behind traces of DNA where he or she touched it. This is also true regarding DNA left behind in a vehicle or upon a phone. This DNA can be recovered and examined by experts at a forensic laboratory, and a DNA profile may be obtained.

26. Comparing WILLIAMS' DNA profile to any DNA profile obtained from M.M. and L.S. vehicle, would provide evidence related to his unlawful use and possession of those items.

27. Zamer WILLIAMS is currently incarcerated at the Howard R. Young Correctional Institution in Delaware on charges relating to the ATM robberies in Delaware.

AUTHORIZATION REQUEST

28. Based on the foregoing, I request that the Court issue the proposed search warrant for the person of Zamer WILLIAMS, as described in Attachment A, to obtain oral secretion (epithelial cells) by rubbing cotton swabs against the inner cheek lining of WILLIAMS's mouth cavity, in sufficient quantity for scientific examination and comparison for DNA typing and DNA comparison, as described in Attachment B, as evidence of the commission of the crimes charged in the indictment outlined above.

Respectfully submitted,

/S/ Jared Krzywicki
Jared Krzywicki
Special Agent
Bureau of Alcohol Tabacco and Firearms and
Explosives

Subscribed and sworn to before me on 28th day of
March, 2024

/s/Scott W. Reid
The Honorable Scott W. Reid
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Person and Property to Be Searched

Zamer Williams, presently an inmate at the Howard R. Young Correctional Institution is a male with the date of birth (DOB) 07/25/2005, and FBI Number # DW7JR65K0.

ATTACHMENT B

Particular Things to be Seized/Searched

Oral secretion (epithelial cells) by rubbing cotton swabs against the inner cheek lining of the person in Attachment A's mouth cavity, in sufficient quantity for scientific examination and comparison for DNA typing and DNA comparison. Such swabs are commonly referred to as "buccal swabs".